

91 RF 4512

EG&G ROCKY FLATS, INC.
ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

91-RF-4512

Attn: T. Lukow

MODULAR TANK PROJECT, EJO 986819-JMK-0417-91

It is requested that procurement and installation of the modular tanks to replace the 207B ponds as a repository for seepage from the hillside French drains from the central sump be allowed to proceed. No operations will occur until completion of the IM/IRA approval process. The following paragraphs provide the justification for this request.

The fabrication of the tanks must be done on site. The "joining" of the tank sections must be done when ambient temperatures are greater than 50° F. If timely permission is not received, the earliest time frame for installation of the modular tank will become March/April, 1992. The attached schedule shows the desired sequence.

The continued pumping of the central sump water into 207B north will cause complications in solidification of the solar pond sludge which will result in increased final waste form volume, cost increases in the solidification contract, as well as potential schedule impact in meeting the November 8, 1992, loss of RCRA interim status.

The present projected cost of processing and installing the modular tanks is \$1.6M. The estimated cost of the portable evaporation installation currently in progress is \$5.2M. Thus the increase in cost risk is minimal in comparison with total project costs.

Other alternatives were examined previously in preparation of the project plan and RCRA permit submittal. Given that the water had to be controlled, the other options evaluated were as follows:

- Increased use of the 374 evaporator. Studies conducted in early 1990 demonstrated that sufficient increased capacity was not available and in fact would require major upgrades to the evaporator and distillate distribution system at significant cost and elapsed time.
- Diverting the central sump water to B series detention ponds would be a violation of the FFCA and NPDES permit in that it would be an uncontrolled discharge.
- Construction of a surface impoundment rather than the modular tanks was environmentally unsound.

ADMIN RECORD

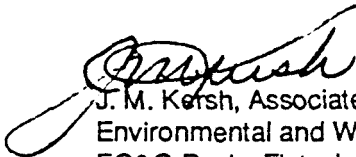
REVIEWED FOR CLASSIFICATION/USNI

By Bea Duran
Date 8-16-93

Date 8-16-93

R. M. Nelson
July 24, 1991
91-RF-4512
Page 2

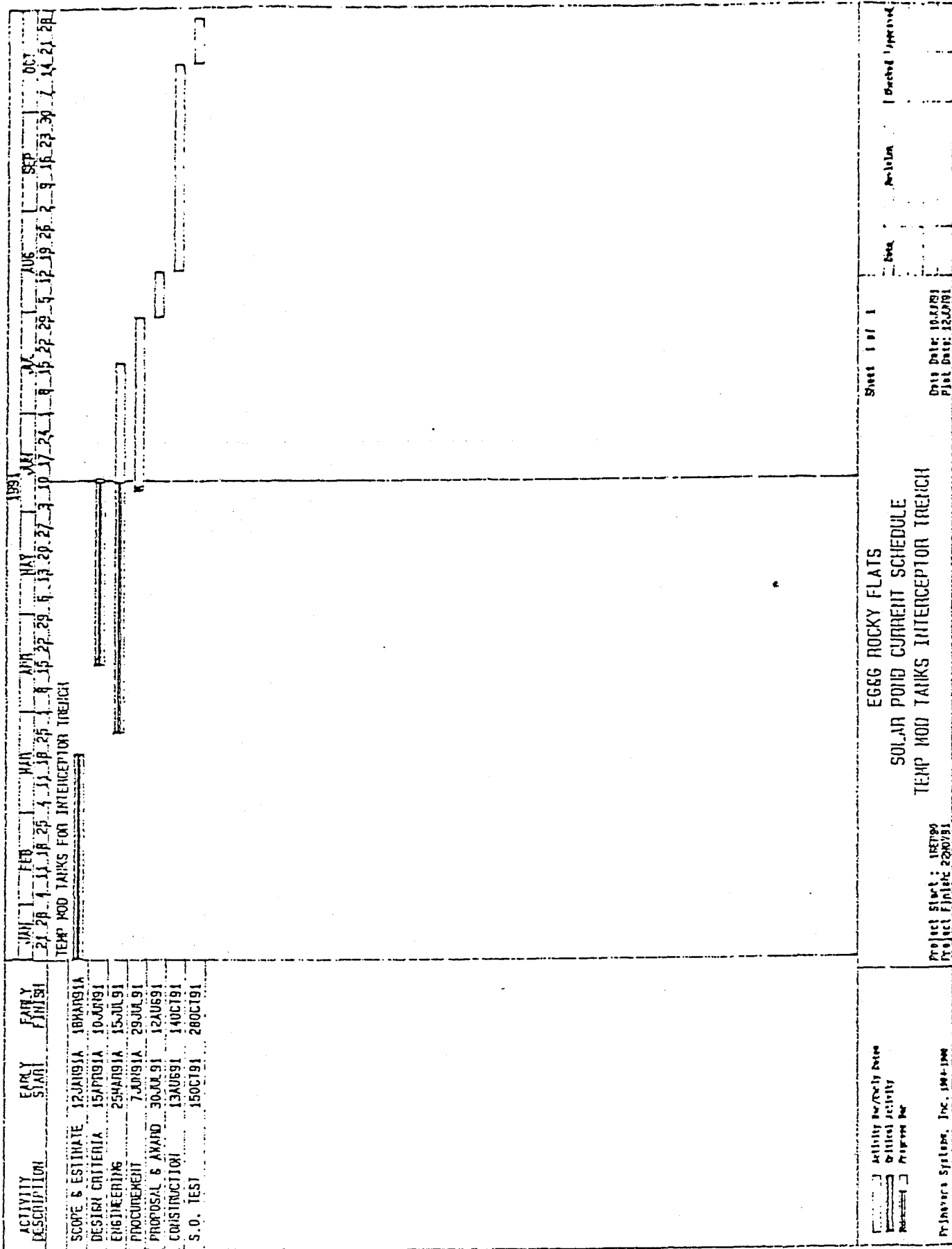
In conclusion, the risk of continuing the procurement and construction of the modular tanks is small in comparison with the risks, both cost and environmental, of taking no action until the IM/IRA is complete. In view of the unfavorable alternatives evaluated above, I do not believe that the recommended action would prejudice the IM/IRA process. Therefore, I request that EG&G continue procurement, site preparation, and tank installation.



J. M. Kerish, Associate General Manager
Environmental and Waste Management
EG&G Rocky Flats, Inc.

DRF:mmr

Orig. and 1 cc: - R. M. Nelson, Jr.



EG&G ROCKY FLATS		Sheet 1 of 1	
SOLAR POND CURRENT SCHEDULE		Rev	Revised/Approved
TEMP MOD TANKS INTERCEPTION TRENCH		Date	Date
Project Start: 18ET90		Date Date: 10/2/91	
Project Finish: 28OCT91		Plot Date: 12/2/91	
Polaris Systems, Inc. 1004-100			